

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

BRENDA HEPP and TARA HARDY,  
individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

AMERIHEALTH CARITAS  
SERVICES, LLC,

Defendant.

Case No: 2:19-cv-02194-GJP

**NOTICE OF SETTLEMENT**

PLEASE TAKE NOTICE that Plaintiffs Brenda Hepp and Tara Hardy (“Plaintiffs”) and Defendant AmeriHealth Caritas Services, LLC (collectively, the “Parties”) have reached a settlement of the claims in the above-captioned matter and in Wood v. AmeriHealth Caritas Services, LLC, Case No. 2:17-cv-03697. The Parties additionally state as follows:

1. On August 3, 2019, the Court granted the Parties’ Joint Motion for Stay of Proceedings Pending a Second Mediation (ECF No. 7).
2. On September 27, 2019, the Parties participated in a mediation with mediator Michael Dickstein, during which the Parties reached a settlement of the claims in the above-captioned matter and in Wood v. AmeriHealth Caritas Services, LLC, Case No. 2:17-cv-03697.
3. The Parties are currently negotiating the terms of a settlement agreement and are preparing a Motion for Preliminary Approval.
4. The Parties intend to execute the settlement agreement no later than November 11, 2019.

5. Plaintiffs intend to file an Unopposed Motion for Preliminary Approval no later than November 18, 2019.

Dated: October 3, 2019

Respectfully submitted,

**NICHOLS KASTER, PLLP**

**MORGAN, LEWIS & BOCKIUS, LLP**

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/s/Michael J. Puma

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